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REMARKS

Claims 1-20 are currently pending in the patent application. The Examiner has finally rejected Claims 1-13 and 15-20 under 35 USC 102(e) as anticipated by Hoffman, et al; and, Claim 14 under 35 USC 103 as being unpatentable over the teachings of Hoffman in view of Draves. For the reasons set forth below, and based on the amendments presented herein, Applicants respectfully assert that all of the pending claims are patentable over the cited prior art.

As previously detailed, the Hoffman patent is directed to a system and method for maintaining state data related to client requests at an otherwise stateless server. Hoffman discloses that a server defines a project object for a server application, either in response to a client request or in advance of any client requests, wherein the project object is available to all clients accessing the particular application on the server (Col. 4, lines 35-37). Once a client request has been received at the server and the state data has been created for that request, the server issues a request to the state manager (Col. 4, lines 42 and 48) to store the state information. The state manager increments

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an item count for its storage area/project object, creates a storage reference, or handle, based on the item count, and stores the state data in the object storage at the location referenced by the storage reference/handle. The handle is then passed with the page data being returned to the client browser as a variable in the URL, a cookie, or a hidden field (Col. 5, lines 22-23). Upon subsequent client requests, that handle will automatically be included in the client requests in accordance with known URL, cookie or hidden field processing. When the server receives the subsequent client request, it will have the handle for the state data and will then be able to use the state data to retrieve the next requested data for the next client request (Col. 5, lines 34-43).

The state data of Hoffman is not the "common data" which is taught, and is now expressly claimed, in the present application. The present invention explicitly describes common data as data that is transferred from a first source entity to a second entity with a request to store the common data at the second entity. The common data is distinct from invocation-specific data (see: bottom of page 7 and top of page 8 of the current Specification) and

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is also distinct from state data, which is information about the state of data that already resides at the second entity. State data in Hoffman merely represents a pointer to the page last requested by the client. It is not data to be stored at a second entity at the request of the first entity and it is not data on which a service can be invoked. Further, the common data of the present invention is transmitted from its source (i.e., the first entity or client) and is not created at the storage location (i.e., the second entity or server). The Hoffman state data is created at the server/storage location.

Applicants have also noted the distinction that, under the present invention, the data handle is overtly communicated between the data source (i.e., the first entity) and the data storage location (i.e., the second entity). The data handle is intentionally, directly incorporated into future communications from the data source to the storage location. It is not hidden in a URL or cookie, but is known at the data source and is purposefully included in future communications related to invoking services on the common data which is stored at the server.

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In addition, Applicants note that when the server accesses the state data using the handle in Hoffman, the state data is used **by** the server, for example so that a "next page" can be accessed. A service is not actually **invoked on** the state data in Hoffman; whereas the present invention expressly teaches and claims invoking a service **on** the common data using the data handle.

With specific reference to the claim language, the present invention provides a method, system, and program storage device for data handling wherein the method comprises transferring common data from a source entity requesting storage at the second entity, storing the common data at the second entity, associating a data handle to the stored data, wherein the first and second entities are each aware of the handle, and invoking at least one service on the common data by making a request including the data handle. Clearly the claimed features of the present invention are neither taught nor suggested by the Hoffman patent.

Applicants have again amended the independent claims to highlight the distinguishing features of the present invention. Applicants have also amended the dependent

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claims, where necessary, to be consistent with the language of the amended independent claims.

For a patent to anticipate another invention under 35 USC § 102(e), the patent must clearly teach each and every claimed feature of the anticipated invention. Since the Hoffman patent clearly does not teach the transferring of common data from a first source entity for storage at a second entity, does not teach storing common data as stored data at the second entity, does not teach associating a handle to the stored data where each entity is aware of the handle, does not teach invoking a service on the common data using the handle, it cannot be maintained that the Hoffman patent anticipates each and every claim feature recited in independent claims 1, 15 and 20. Further, a reference which does not anticipate an independent claim, cannot be said to anticipate a dependent claims which depends therefrom and adds limitations thereto. Accordingly, Applicants respectfully request withdrawal of the anticipation rejections of Claims 1-13 and 15-20.

With specific reference to the language of the dependent claims, Applicants respectfully assert that the Hoffman patent does not teach storing the data handle with

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the stored data (Claim 2). Rather, Hoffman only stores the state data and sends the page data to the client. With regard to Claim 3 wherein said transferring and said invoking are done simultaneously and wherein said method further comprises invoking at least one successive service on said data by using said data handle after said storing and associating steps, Applicants reiterate that Hoffman does not invoke services on common data which has been stored at the second entity at the request of the first entity. Regarding Claim 4, Hoffman does not teach or suggest that the first entity invokes at least one service by providing at least service invocation-specific data and the data handle to said second entity. The Hoffman client simply makes new retrieval requests, without being aware of the data handle. Moreover, the new request is not for invoking a service on stored common data, it is for accessing new data. With regard to Claim 5, Hoffman does not teach that a first entity invokes a plurality of services on common data by transferring a composite service invocation to said second entity. Hoffman does not invoke services on common data, let alone generate a composite service invocation or of any service invocation on stored

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data. As to Claim 6, Hoffman does not teach that the associating of the handle is conducted at a first entity and the handle transferred to the second entity. Rather, Hoffman teaches that the server requests storage of the state data, and creates the handle. As to Claim 7, Hoffman does not anticipate the claim language wherein the associating of the handle is conducted at the second entity and wherein the handle is overtly communicated from the second to the first entity. As to Claim 8, which recites that the associating of the handle is performed by a third entity and communicated to the first and second entity, the Hoffman patent makes no mention or suggestion of any third party creating a handle for state data, let alone for common data which is transferred from a first source entity to a second entity for storage and service. With regard to Claim 9, wherein the associating of a handle is performed implicitly by the transfer of the data, Applicants respectfully assert that Hoffman does not teach that the handle is associated implicitly. The Hoffman handle is associated based on an explicit state request. As to Claim 10, Hoffman does not teach a method further comprising transforming common data from a first representation to a

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second representation. While the cited Hoffman teachings do refer to the server dynamically formatting data for delivery to a client, such teachings do not anticipate or obviate the claimed transforming of common data in the context of the transferring, storing, and invoking of the present invention. As to Claim 11, Applicants assert that Hoffman does not invoke a service on its state data. It simply accesses the state data and uses it to speed up its servicing of the client's next retrieval request. Hoffman does not teach or suggest transfer of stored state data, or any data, across a network. As to Claim 12, the Hoffman encryption of client access data is not the same as nor suggestive of encrypting state data, and clearly does not anticipate the claim language wherein at least one service comprises encryption of stored data. As to Claim 13, the Hoffman I/O is not performed on stored state data and is clearly not the same as nor suggestive of the claimed invention wherein said at least one service comprises file I/O by the second entity. As to Claims 15-19, the Examiner has simply referred to the rejections of Claims 1-13. Applicants similarly rely on the above arguments with regard to Claims 1-13.

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Finally, the Examiner has rejected Claim 14 based on a combination of Hoffman and Draves. Claim 14 recites that the second entity comprises a kernel and the service is provided by the second entity. While the Draves patent does teach that a kernel of an operating system maintains a resource table, the combination of Hoffman and Draves does not obviate the claimed invention. Draves does not teach the aspects which are missing from the Hoffman patent (i.e., the transferring of common data from a first source entity for storage at a second entity, associating a handle to the stored data where each entity is aware of the handle, invoking a service on the data using the handle). Further, simply combining Hoffman and Draves would result in a Hoffman system with a kernel of an operating system at the Hoffman server. It would not, however, result in a system wherein a service is provided by that kernel on stored data, since neither Draves nor Hoffman transfers and stores the data on which a service is to be invoked, creates a handle for that data, and invokes services on stored data. Accordingly, Applicants conclude that the claim language is not obviated.

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Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the claim language, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

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